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MB Prosound and Staging, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD OTIS BOYD II, an individual,

Plaintiff,

vs.

MB PROSOUND AND STAGING, INC., a
Foreign Corporation; DOE DEFENDANTS I-
XX, inclusive; DOE MB PROSOUND
EMPLOYEES I-XX; and ROE
CORPORATIONS I-XX, inclusive,

Defendant(s).

Case No. 2:23-cv-02092-APG-MDC

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES AND AMEND CURRENT
DISCOVERY PLAN AND SCHEDULING
ORDER [ECF No. 15].**

First Request

The parties hereby stipulate and agree, subject to this Court's approval, to extend the current discovery deadlines and amend the Discovery Plan and Scheduling Order (ECF No. 15) by ninety (90) days. This is the first request to extend the discovery deadlines in this matter. The parties are in agreement that the requested extension is in the interest of all parties to allow the parties to efficiently litigate this case. The parties submit that this extension is sought in good faith and will not unduly delay these proceedings.

I. Discovery Completed To Date

1. Plaintiff served his initial disclosures on January 26, 2024.
2. Defendant served its initial disclosure on January 24, 2024.
3. Defendant served Plaintiff with record authorizations to be signed and returned on February 16, 2024. Plaintiff provided authorizations on March 19, 2024.

4. On February 16, 2024, Defendant served written discovery requests on Plaintiff, including interrogatories and requests for production of documents. Responses are due on March 22, 2024 pursuant to an agreed-upon extension.
5. On February 23, 2024, Plaintiff served a Subpoena Duces Tecum to ESPN Productions, Inc. for video footage of the incident.
6. On March 11, 2024, Plaintiff served written discovery requests on Defendant, including interrogatories and requests for production of documents. Responses are due on April 10, 2024.
7. Parties are in the process of scheduling party depositions, but need to complete written discovery first.

II. Discovery Left to Be Completed

1. Expert discovery.
2. Treating doctor depositions.
3. Plaintiff's deposition.
4. Defendant's deposition (30(b)(6)).
5. Other percipient witnesses as needed.

III. Reasons for Requested Extension

Shortly after the Discovery Plan and Scheduling Order was adopted in this matter, Defendant issued discovery requests seeking HIPPA authorizations to obtain Plaintiff's complete medical records to use in expert review. Plaintiff provided authorizations on March 19, 2024. Additional time will be necessary to gather complete medical records and allow for sufficient expert review of records. The parties also need to complete written discovery before party depositions case be completed. Accordingly, the parties respectfully request a brief ninety-day extension to complete all necessary discovery.

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	Current	Proposed
Amend Pleadings/Add Parties	April 11, 2024	July 10, 2024
Initial Expert Disclosures	April 11, 2024	July 10, 2024
Rebuttal Expert Disclosures	June 10, 2024	September 9, 2024
Dispositive Motions	August 9, 2024	November 7, 2024
Joint Pretrial Order ¹	September 9, 2024	December 9, 2024

IV. Current and Proposed Deadlines

Accordingly, the parties respectfully request that the Court enter an order approving the proposed discovery schedule as set forth above. This request is made in good faith and will not cause undue delay.

DATED March 19, 2024

DATED March 19, 2024

MAINOR ELLIS, LLP

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IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE
 Date: 3-21-24

¹ In the event a dispositive motion is timely filed, the date for filing the joint pre-trial order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motion, or otherwise by further Court order.